

JAP:RTP

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

12M570

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UNITED STATES OF AMERICA

C O M P L A I N T

- against -

GEORGE MARLON JACKSON,
also known as
"Leon Noel Thompson,"

(T. 8, U.S.C.,
§§ 1326(a) and
1326(b)(2))

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

DANIEL TEITELBAUM, being duly sworn, deposes and states that he is a Customs and Border Protection Enforcement Officer ("CBPOE"), duly appointed according to law and acting as such.

On or about June 13, 2012, within the Eastern District of New York, the defendant GEORGE MARLON JACKSON, also known as "Leon Noel Thompson," an alien who had previously been deported from the United States after a conviction for an aggravated felony, was found in the United States without the Secretary of the United States Department of Homeland Security, successor to the Attorney General of the United States, having expressly consented to such alien's applying for admission.

(Title 8, United States Code, Section 1326(b)(2)).

The source of your deponent's information and the grounds for his belief are as follows:^{1/}

1. I have been involved in the investigation of numerous cases involving the illegal re-entry of aliens. I am familiar with the facts and circumstances set forth below from my participation in the investigation; my review of the investigative file, including the defendant's criminal history record; and from reports of other law enforcement officers involved in the investigation.

2. On or about June 13, 2012, the defendant GEORGE MARLON JACKSON, also known as "Leon Noel Thompson," arrived at John F. Kennedy International Airport in Queens, New York, aboard Virgin Airlines flight # VS 45 from London, England. The defendant presented a United Kingdom passport in the name George Marlon Jackson and requested permission to enter the United States under the Visa Waiver Permanent Program. The defendant's fingerprints were taken and submitted for identification and verification purposes.

3. The defendant's fingerprints matched the fingerprints of Leon Noel Thompson. Criminal records indicate that Leon Noel Thompson, a citizen of Jamaica, had been

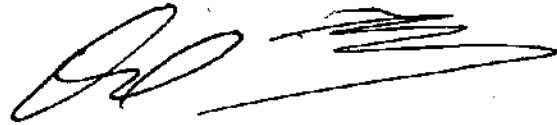
^{1/} Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

previously removed from the United States on or about August 29, 2002, following his conviction on or about March 27, 2001, in the United States District Court for the Southern District of Florida for importation of cocaine, contrary to Title 21, United States Code Section 952(a), an aggravated felony offense.

4. The defendant was read his Miranda rights and agreed to speak to CBPOEs without an attorney present. The defendant stated, in part and in substance, that his true name is George Marlon Jackson, he was born in Jamaica, he was arrested in Miami, Florida, for bringing cocaine into the United States, and that he spent one to two years in prison. He also stated that the person who gave him the cocaine to bring into the United States had given him a Jamaican passport that had his photograph on it but was in someone else's name. The defendant further stated that he was deported to Jamaica from Miami following the end of his incarceration and that after he was deported to Jamaica from Miami, he entered the United Kingdom around 2003 using a Jamaican passport and was granted asylum around 2009-10.

5. A preliminary search of immigration records has revealed that there exists no request by the defendant for permission from the Secretary of the Department of Homeland Security, successor to the Attorney General of the United States, to reapply for admission to reenter the United States after removal.

WHEREFORE, your deponent respectfully requests that the defendant GEORGE MARLON JACKSON, also known as "Leon Noel Thompson," be dealt with according to law.



DANIEL TEITELBAUM
Customs and Border Protection
Enforcement Officer

Sworn to before me this
14th day of June, 2012

UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK